



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 19, 2017

Juli Mann  
Senior Regulatory Analyst  
Authorized Agent for Insect Shield, LLC  
Steptoe and Johnson LLP  
1330 Connecticut Avenue NW  
Washington, DC 20036-1795

Subject: PRIA Label Amendment – Adding Zika claims, hammocks and horse covers  
Product Name: INSECT SHIELD REPELLENT GEAR  
EPA Registration Number: 74843-5  
Application Date: 9/9/2016  
Decision Number: 521294

Dear Ms. Mann:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Autumn Metzger at 703-305-5314, or at [Metzger.autumn@epa.gov](mailto:Metzger.autumn@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3  
Invertebrate and Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**MASTER LABEL**

**INSECT SHIELD REPELLENT GEAR** [optional wording identifying gear brand or style]

Not to Scale



**This item has been treated with permethrin insect repellent.**  
**Repels mosquitoes, ticks, fleas, and flies.**  
Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, hammocks, awnings, patio umbrella covers, kennel covers, stall covers. Repellency remains effective for 25 washings for washable items: sleeping bag covers, backpacks, camping sheets, furniture covers, outdoor furniture cushion covers, floor mats, netting, blankets, travel sheets, ground cloths, beach towels, table cloths, place mats, curtains, horse blankets and coverings, pet bedding.

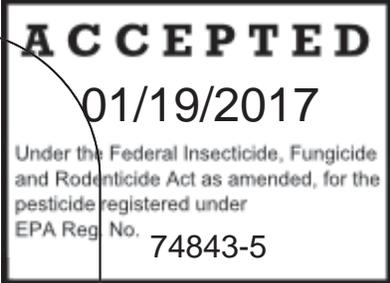
ACTIVE INGREDIENT:  
Permethrin .....0.52%  
OTHER INGREDIENTS: (Gear) .....99.48%  
TOTAL: .....100.00%

**Directions for Use**  
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  
Do not dry clean. Do not re-treat gear with other permethrin insect-repellent products. Wash separately from other items.  
Do not use or recycle this product for purposes other than originally intended.  
For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

**Storage and Disposal:** Do not contaminate water, food or feed by storage or disposal.  
**Disposal:** Discard in trash when gear is worn out.

EPA Reg. No. 74843-5                      EPA Est. No.:  
Manufactured for: Insect Shield, LLC  
814 West Market Street, Greensboro, NC 27401

[ESL date]                                      [REVdate]



**Gear Hangtag**  
Actual size is 2 3/8" wide x 4 5/8" high

**Not to Scale**

**insect shield<sup>®</sup>**  
repellent gear

Repels mosquitoes, ticks, fleas,  
and flies.

Repellency remains effective for  
25 washings for washable  
items. Repellency to  
mosquitoes remains effective  
for 6 months of exposure to  
weathering for non-washable  
items.

Do not dry clean. Refer to the  
hangtag for more information.

ACTIVE INGREDIENT:  
Permethrin 0.52% w/w

EPA Reg. No 74843-5  
EPA Est. No.:

Wash separately from other  
items.

Disposal: Discard in trash when  
gear is worn out.

[REV/date]

**Sewn-in Gear Label**  
Actual size is 1 1/4" wide x 4 1/8" high

**Note to Reviewer:** [REV date] identifies the last label revision

## Optional Marketing Statements:

1. Repels mosquitoes
2. Repels ticks
3. Repels flies
4. Repels fleas
5. Bug repellent
6. Whether in the backwoods or the backyard, Insect Shield Repellent Gear helps keep you protected
7. Insect Shield Repellent Gear is a patent-pending technology for treating gear that repels mosquitoes, flies, ticks and fleas
8. By taking advantage of the latest fibers and technology, we've created innovative gear that also repels insects
9. Enjoy the Outdoors
10. Repels flies, fleas and ticks from animal bedding
11. No bugs, no bite
12. Repels mosquitoes [including those which may carry West Nile virus][including those which may transmit malaria][including those which may transmit Zika virus]
13. Repels ticks [including those which may carry Lyme disease]
14. Repels insects including those that carry [Lyme disease], [West Nile virus], [malaria], [Zika virus] and [other insect borne diseases]
15. [Insect Shield] protects against insects including those that carry [Lyme disease], [West Nile virus], [Zika virus] and [malaria]
16. Repels mosquitoes, ticks, flies and fleas
17. All buzz, No bite
18. You can't tell it's there but the bugs can
19. Build-In Insect Protection
20. Invisible
21. Invisible protection
22. Durable
23. Convenient
24. Comfortable
25. Effective
26. Easy Care
27. Used as a heading: [Insect Shield] Advantages
28. Tested
29. Proven protection
30. Long-lasting protection
31. Built-in [Insect Shield]
32. Odorless
33. Built-in invisible, odorless insect protection
34. Unscented
35. Unscented protection
36. No unpleasant scent
37. Repel without the smell
38. Technology is the result of years of research and field study

Note to Reviewer: Number Sequence of Optional Marketing Statements for tracking purposes

39. [Insect Shield] technology converts gear into long-lasting effective and convenient insect protection
40. [Insect Shield] offers protection for the entire family
41. Helps you protect your entire family from insects
42. Family protection
43. Insect protection for your entire family
44. Protecting you and your family
45. Bug barrier
46. What makes it work?
47. Winning the battle against bugs
48. Don't be bugged
49. Changing the way you think about insect protection
50. Ditch the itch
51. If you love being outdoors, you'll love [Insect Shield]
52. It's time to annoy them for a change
53. It's time to annoy the bugs for change
54. Wouldn't it be great to annoy them for a change?
55. Insect Shield is a revolutionary defense in the battle against bugs
56. picture of grass
57. picture of crawling bugs/mosquitoes
58. Neither Insect Shield nor any other insect protection product can guarantee complete protection from insects or insect bites.
59. Insect Shield protection is built right in and lasts 25 washings, the expected lifetime of the product.
60. Who can use it? (everyone)(your whole/entire family)
61. Good news! Bugs won't love you anymore.
62. Insect repellent (Product type<sup>1</sup>)
63. Bug repellent (Product type<sup>1</sup>)
64. (Product Type<sup>1</sup>) with Insect Protection
65. Insect Shield treated (product type<sup>1</sup>)
66. Insect Shield (product type<sup>1</sup>)

Note to Reviewer: Number Sequence of Optional Marketing Statements for tracking purposes

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<sup>1</sup> Where product type refers to the product variety (i.e, tents, tarps, hammocks, awnings, patio umbrella covers, kennel covers, stall covers, sleeping bag covers, backpacks, camping sheets, furniture covers, outdoor furniture cushion covers, floor mats, netting, blankets, travel sheets, ground cloths, beach towels, table cloths, place mats, curtains, horse blankets and coverings, pet bedding).